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BASS, BERRY & SIMS PLC

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OTHER OFFICES:

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KNOXVILLE
MEMPHIS

January 9, 2003

VIA HAND DELIVERY

Mr. K. David Waddell
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

Re: Complaint of Michael Van Wies against CenturyTel of Ooltewah-Collegedale, Inc., TRA Docket No. 02-00058.

Dear Mr. Waddell:

Enclosed please find an original and 13 copies of a letter to Michael Van Wies submitted on behalf of CenturyTel of Ooltewah-Collegedale, Inc. for filing in the above-referenced docket. Also enclosed is an additional copy of the letter, which I would appreciate your stamping as "filed," and returning to me by way of our courier.

Should you have any questions with respect to this filing, please do not hesitate to contact me.

Very truly yours,



Ross I. Booher

RIB/cw

Enclosures

cc: Mr. Michael Van Wies
Ms. Susan Smith

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January 9, 2003

VIA FACSIMILE: 423/238-9088
AND FEDERAL EXPRESS

Michael Van Wies
8504 Horseshoe Bend Lane
Ooltewah, TN 37363-5627

Re: Petition of Michael Van Wies, T.R.A. Docket No. 02-00058

Dear Mr. Van Wies:

Your December 20, 2002, supplemental response to CenturyTel's Interrogatory No. 7(h), revealed for the first time the existence of four documents that you intend to use at the Hearing. These documents have never been produced to CenturyTel, even though they were requested in CenturyTel's Requests for Production Nos. 1, 5, 6, 7, 8 and 10 (dated May 24, 2002) and in CenturyTel's letter to you regarding discovery (dated June 14, 2002) which was an adjunct to CenturyTel's motion to compel (dated July 5, 2002). Your June 12, 2002, discovery response stated that all requested documents had been filed with the TRA in this docket. As shown by the recent revelation of these four documents, it is now clear that all responsive documents have not been filed and that required supplementation has not occurred. Given CenturyTel's repeated requests for the production of documents such as these, I write to give you notice that CenturyTel intends to object at the Hearing if you (or your expert or witnesses) attempt to use or rely upon any document, material or evidence that you have failed to timely produce to CenturyTel or timely file in this docket with the TRA.

If, however, you promptly forward to us the four recently revealed documents, we will reconsider our objection. This also applies to any other documents/materials/evidence not previously filed or produced that you (or your expert or witnesses) intend to use or rely upon in this matter.

Thank you for your cooperation in this matter. Please do not hesitate to contact me if you have any questions.

Sincerely,



Ross Booher

cc: Jonathan Wike

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